

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

BLACK LOVE RESISTS IN THE RUST, et al.

Plaintiffs,

-vs-

CITY OF BUFFALO, et al.

Defendants.

FIRST SUPPLEMENTAL
RESPONSES TO PLAINTIFFS'
FIRST SET OF INTERROGATORIES TO
DEFENDANT CITY OF BUFFALO, N.Y.

Civil Action No.: 18-cv-719

Defendant, CITY OF BUFFALO ("City"), offers the following FIRST SUPPLEMENTAL RESPONSE to Plaintiffs' "FIRST SET OF INTERROGATORIES TO DEFENDANT CITY OF BUFFALO, N.Y.", incorporating by reference all prior responses and objections thereto, based on information available as of the date prescribed herein:

GENERAL OBJECTIONS

1. The City responds to each and every interrogatory subject to the general obligations set forth herein. These objections form a part of the response to each and every interrogatory and are set forth here to avoid duplication by restating them for each interrogatory and document request. These general objections may be specifically referred to in response to a certain interrogatory and document request for purpose of clarity. However, the failure to specifically refer to a general objection is not and shall not be construed to be a waiver of any general objection, even if other general objections are specifically stated in response to an interrogatory and document request.

12. The City objects to these interrogatories to the extent that they seek information which is proprietary in nature.

FIRST SUPPLEMENTAL INTERROGATORY RESPONSES

INTERROGATORY NO. 1: Identify each Person who has worked as part of the Strike Force or Housing Unit and provide his or her Employment History at the BPD.

OBJECTION: The City objects to this interrogatory to the extent that it is overly broad, unduly burdensome, is not likely to result in the production of admissible evidence. The City also objects to this interrogatory to the extent that the phrase “worked as part of” is vague and ambiguous. The City additionally objects to this interrogatory in that it seeks irrelevant, personal, and confidential information not subject to disclosure in this civil action. The City specifically objects to the term “Employment History”, as its defined the Plaintiffs’ Interrogatories as overly broad and potentially seeking information and materials protected by Civil Rights Law §50-a.

RESPONSE: Without waiving these objections, upon information and belief, the Buffalo Police Department’s Strike Force was generally made up of approximately 20 police officers and the Housing Unit made up of approximately 18 police officers with some changes in personnel over the period identified. Officers in the Strike Force and Housing Unit held positions as Captain (“Capt.”), Lieutenant (“Lt.”), and Police Officer (“PO”). The Buffalo Police Department also has positions of Detective (“Det.”) and Detective Sergeant (“Det. Sgt.”). In an attempt to avoid an unnecessary discovery dispute and move this matter forward, the following individuals may be responsive to this

demand (where multiple positions were held during the requested time period, each position is identified):

STRIKE FORCE

- Lt. Michael Quinn. Hired on January 30, 1997. Retired on June 30, 2018.
- Lt. David Piech. Hired on February 4, 1994.
- Lt. George McLean. Hired on February 4, 1994. Retired on June 28, 2018.
- Lt. Ivan Watkins. Hired on March 1, 1998. Retired on June 29, 2018.
- Lt. Brian Strobele. Hired on August 6, 1986. Retired on November 30, 2017.
- Lt. David Wilcox. Hired on July 29, 1988. Retired on December 19, 2016.
- Lt. Thomas Whelan. Hired on January 31, 1995. Retired on September 24, 2018.
- Lt. Robbin Thomas. Hired on January 28, 1999.
- Lt. James C. O'Donnell. Hired on September 15, 1995.
- Lt. Marcus Rogowski. Hired on July 31, 2009.
- Lt. Daniel Burke. Hired July 29, 1988. Retired on May 23, 2015.
- PO/Lt. Scott Culver. Hired on January 13, 2012.
- PO/Lt. Bradford Pitts, II. Hired on January 16, 2009.
- PO/Lt. Robert Danner. Hired on January 13, 2012.
- PO/Det. Sgt. Amy Frankel. Hired on April 19, 2002.
- PO/Det. Jerry Guilian. Hired on July 30, 1994.
- PO/Det. Anthony Fanara. Hired on January 13, 2012.
- PO/Det. Michael J. Acquino. Hired on January 18, 2008.
- PO Robert Salamone. Hired on January 30, 1984.
- PO Richard Lopez. Hired on March 24, 1986.
- PO Joseph Walters. Hired on July 29, 1988.
- PO Michael Martinez. Hired on August 31, 1990. Retired on August 31, 2018.
- PO Joseph Chojnacki. Hired on August 5, 1994.
- PO Debra Strobele. Hired on October 2, 1989. Retired on March 31, 2018.
- PO Thomas Zak. Hired on November 19, 2007.
- PO Mark Hamilton. Hired on January 18, 2008.
- PO Christopher Fields. Hired on January 16, 2009.
- PO Richard Hy. Hired on January 13, 2012.
- PO Darren McDuffie. Hired on January 13, 2012.
- PO Adam Wigdorski. Hired on August 3, 2012.
- PO Aaron Pariseau. Hired on January 18, 2008.
- PO Robert Heidinger. Hired on July 23, 1998. Retired on September 29, 2018.
- PO Jonathan Bierl. Hired on August 1, 2008.
- PO Latasha Howard. Hired on November 18, 2008.
- PO Charles Miller. Hired on January 13, 2012.
- PO John Poisson. Hired on August 10, 1989. Retired on May 31, 2018.

- PO Nathan Maryanski. Hired on January 13, 2012.
- PO Charles Skipper. Hired on January 6, 1998.
- PO Justin Tedesco. Hired on August 3, 2012.
- PO Sean Zoll. Hired on July 31, 2009.

HOUSING UNIT

- Capt. Guy Zagara. Hired on July 30, 1993. Retired on August 21, 2013.
- Capt. Patrick Roberts. Hired on March 1, 1988. Retired on June 29, 2015.
- Capt. Philip Serafini. Hired on August 27, 1986. Retired on December 31, 2018.
- Capt. Scott Testa. Hired on January 16, 1998.
- Lt. Lance R. Russo. Hired on September 15, 1995.
- Lt. Jeffrey M. Giallella. Hired on January 31, 1995.
- Lt. Brian Strobele. Hired on August 6, 1986. Retired on November 31, 2017.
- Lt. Joseph Lynch. Hired on July 29, 1988. Retired on December 31, 2018.
- PO/Det. Bart Adams. Hired on November 19, 2007.
- PO/Det. Michael J. Acquino. Hired on January 18, 2008.
- PO/Det. William Macy. Hired on January 18, 2008.
- PO/Det. Anthony Shea. Hired on August 1, 2008.
- PO Michael Bennett. Hired on February 4, 1994. Retired on June 31, 2017.
- PO Joseph Paolucci. Hired on September 19, 1995. Retired on June 30, 2010.
- PO Robert Joyce. Hired on August 4, 1991.
- PO Edmond Labby, Jr.. Hired on July 31, 1997. Retired on August 31, 2017.
- PO Donna Donovan. Hired on January 1, 1998.
- PO David Acosta. Hired on January 31, 1983. Retired on February 28, 2015.
- PO Angelo Threats. Hired on January 26, 2000.
- PO Cory Krug. Hired on May 19, 1999.
- PO John Evans. Hired on January 25, 2001.
- PO Ann Devaney. Hired on May 18, 1997.
- PO Sherry Holtz. Hired on September 22, 1997.
- PO William Rezabek. Hired on January 18, 2008.
- PO Thomas Nunan. Hired on January 18, 2008.
- PO Adolphus Barkor. Hired on January 18, 2008.
- PO Jeanan Sharpe. Hired on January 18, 2008.
- PO Joseph Hassett. Hired on July 31, 2009.
- PO Shawn Adams. Hired on January 25, 2001.
- PO Donna Benitez. Hired on January 25, 2001. Retired October 26, 2018.
- PO Patrick Humiston. Hired on January 25, 2001.
- PO Kelvin Sharpe. Hired on August 1, 2008.
- PO Jonathan Bierl. Hired August 1, 2008.
- PO Kenneth Agee. Hired on August 1, 2008.
- PO Andre Lloyd. Hired on January 16, 2009.

- PO Christopher Fields. Hired on January 16, 2009.
- PO Elizabeth Baker. Hired on August 1, 2008.
- PO John Lattanzio. Hired on January 18, 2008.
- PO Mark Hamilton. Hired on January 18, 2008.
- PO Jared Domaracki. Hired on January 18, 2008.
- PO John Poisson. Hired on August 10, 1989. Retired on May 31, 2018.
- PO Jerry Guilian. Hired on January 30, 1997.
- PO Latasha Howard. Hired on January 18, 2008.
- PO Anniel Vidal. Hired on January 13, 2012.
- PO William Robinson. Hired on January 18, 2008.
- PO Joshua Craig. Hired on January 13, 2012.
- PO Patrick Crowley. Hired on September 15, 1995. Retired on December 30, 2017.
- PO Joseph Acquino. Hired on February 22, 2010.
- PO Charles Miller. Hired on January 13, 2012.
- PO Andrew Whiteford. Hired on January 13, 2012.
- PO Terrance Ciszek. Hired on January 17, 2014.
- PO Armonde Badger. Hired on July 31, 2015.
- PO Michael Norwood. Hired on January 18, 2013.
- PO Omar Rodriguez. Hired on July 30, 2009.
- PO Ryan Crespo. Hired on August 1, 2014.

All individuals identified are, or were, City of Buffalo employees. The City of Buffalo maintains an office at 1100 City Hall, 65 Niagara Sq., Buffalo, New York 14202. Due to the size of the time period, and scope of the request, there may be additional individuals identified during discovery and the City will further supplement this response as needed.

INTERROGATORY NO. 2: Identify each Person who signed a Traffic Safety

Checkpoint Tally Sheet or Buffalo Police Department Roadblock Directive.

OBJECTION: The City objects to this interrogatory to the extent that it is overly broad, unduly burdensome, is not likely to result in the production of admissible evidence, and seeks irrelevant information not subject to disclosure in this civil action.